

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT of TEXAS
HOUSTON DIVISION

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PLAINTIFF,

Caitlin Weathers

Versus

CIVIL ACTION 4:22-CV-04085

DEFENDANTS,

Houston Methodist Hospital, et al.

MOTION FOR RECONSIDERATION

1. **Parties.** Plaintiff, Caitlin Weathers, moves the Court to reconsider a default judgment against Defendant(s) Houston Methodist Hospital, et. al., under Rule 21, 239, and 503 of the Texas Rules of Civil Procedure.
2. **Grounds.** Movant, Caitlin Weathers, is entitled to be granted a motion for default judgment against the opposing party, Houston Methodist Hospital, et. al, and as grounds to justify the same, shows the court the following:
 - a. On 10/21/2025, an Answer was due as to the Fifth Circuit Court of Appeals mandate that deemed the Charge of Discrimination timely.
 - b. It has been 217 days since the mandate was issued, warranting an Answer, but the Defendants never even filed a Position Statement to prevent prejudice against the Plaintiff. The Defendants have failed to comply with the orders in the mandate by ignoring the short and plain statement in the Charge of Discrimination.
 - c. On 12/10/2025, Defendants filed a Motion for a More Definite Statement in response to the *granted* and *unopposed* complaint, amended to conform to the case's procedural posture upon remand.
 - d. Between 12/29/2025 and 09/30/2024, the Defendants made arguments to the substance of Weathers' claims in the Charge of Discrimination, indicating knowledge and understanding of the relevant facts therein. The purpose of a Motion for a More Definite Statement is not to be used as a procedural tactic.
 - e. Under **Federal Rules of Civil Procedure 55(b)(2)**, it is proper to request a default judgment by motion to the Court Judge, who then orders the clerk to enter the

default, where the sum of relief sought for compensatory damages needs to be decided. The clerk's entry is not required before a motion is filed.

3. **Prayer.** Movant prays that the Court enter a default judgment in Movant's favor against the Defendants, Houston Methodist Hospital, et. al., for the following relief.

- Economic Damages: \$144,786.72
- Pain and Suffering: \$723,933.60
- Punitive Damages: \$2,895,734.40
- Prejudgment Interest: \$2,942,126.54
- State and Federal: \$5,884,253.08

Total Requested: \$5,884,253.08

Respectfully submitted,

Signature: Caitlin Weathers

Name: Caitlin Weathers

Address: 2425 Capitol St., #2143, Houston, TX 77003

Phone: (832) 314-6357

Email: J.weathersca@gmail.com

CERTIFICATE OF SERVICE

This is to certify that on this April day of 14, 2025 a true and correct copy of the foregoing document was served via email in accordance with the Texas Rules of Civil Procedure upon the following parties:

Dan Patton
Attorney in Charge
Federal Bar No. 26200
Texas Bar No. 240133002
dpatton@scottpattonlaw.com

UNSWORN DECLARATION IN LIEU OF NOTARY, PURSUANT TO TEX. CIV. PRAC.
& REM. CODE § 132.001

I declare under penalty of perjury that all information in the document above is true and correct.
This meets the statutory requirement to verify this pleading.


Signature: _____

Pro Se Litigant

Caitlin Weathers

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